

EPA REG. No 81433-2 Vol. 3

Material Sent for Data Extraction

Reg. # 81433-2

Description: Amendment

☒ Material(s) Sent to Data Extraction Contractors:

☒ New Stamped Label Dated 2-21-2012

☐ Notification Dated _____

☐ New CSF(s) Dated _____

☐ Other: _____

☒ Decision #: ~~459697~~ 457236

☐ Other Action/Comments: _____

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: Dan Peacock

Phone: 305-5407 Division: RD

Date: 2-21-2012



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

FEB 21 2012

IMS Trading, LLC
c/o The Acta Group, L.L.C.
2200 Pennsylvania Avenue, NW, Suite 100W
Washington, DC 20037

Decision 457236

300 5-911102
1155

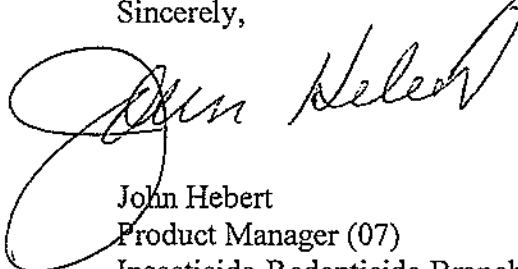
Attention: Mr. Henry M. Jacoby

Subject	IMS Moth Balls EPA Reg No. 81433-2 Your Resubmission of February 3, 2012
Purpose	This submission revises the label for this product under sec 3 of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA).
Labeling	The labeling submitted with the above submission is acceptable, provided that you submit one (1) copy of final printed labeling to us, before you ship your product.
Existing Stocks	Stocks of product with existing labels may be used for eighteen (18) months.
Consequence for non-compliance	If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

Questions

If you have questions about this letter, please contact Mr. Dan Peacock at 703-305-5407 (phone) or peacock.dan@epa.gov (E-Mail).

Sincerely,

A handwritten signature in black ink, appearing to read "John Hebert", with a large, stylized loop at the beginning.

John Hebert
Product Manager (07)
Insecticide-Rodenticide Branch
Registration Division (7505P)

Enclosures: 1. Stamped Label
2. Minimum Type Sizes for Final Printed Labels

Master Label for EPA Reg. No. 81433-2
Alternative Language Enclosed in Brackets []
Revised sizes
Revision: January 31, 2012
Page 1 of 4

081433-00002.20120202

Front Panel:

[Smart Living Moth Balls]
[IMS Moth Balls]
[Lavender Scented Moth Balls]
[Cedar Scented Moth Balls]
[Paper Covered Lavender Scented Moth Ball Packets]
[Paper Covered Cedar Scented Moth Ball Packets]

Kills Moths & Carpet Beetles

No Clinging Odor
Protects Clothing

ACCEPTED FEB 21 2012

When Used in Air-tight Containers This Product is a Federal Insecticide, Fungicide,
and Rodenticide Act, as amended, for the
pesticide registered under:

[75 cu. ft (24 oz)]
[63 cu. ft (20 oz)]
[44 cu. ft (14 oz)]
[38 cu. ft (12 oz)]
[30 cu. ft (10 oz)]
[25 cu. ft (8 oz)]
[19 cu. ft (6 oz)]
[16 cu. ft (5 oz)]
[13 cu. ft (4 oz)]

EPA. Reg. No: 81433-2

KEEP OUT OF REACH OF CHILDREN.

WARNING: See Side and Back Panel For Addt'l Precautions

Ingredient Statement:

Active Ingredient: Paradichlorobenzene	99.5%
Other Ingredients:	0.5%
TOTAL:	100.0%

[Net Wt. 24 oz (680.4 g)]
[Net Wt. 20 oz (567 g)]
[Net Wt. 14 oz (396.9 g)]
[Net Wt. 12 oz (340.2 g)]
[Net Wt. 10 oz (283.5g)]
[Net Wt. 6 oz (170.1g)]
[Net Wt. 5 oz (142.6g)]
[Net Wt. 4 oz (113.4g)]

[IMS Moth Balls] [Smart Living Moth Balls] provide protection for articles stored in clean, air tight containers (e.g., chests and trunks), garment bags, and storage closets. They should be sprinkled or placed on the bottom of the storage space, between the folds and layers of clothes, and on top before securely closing the container.

Right Side Panel:

[Protect in winter and summer and spring and fall.]

[[IMS Moth Balls] [Smart Living Moth Balls] were specially developed to provide the excellent protection of moth balls without the strong smell. [IMS Moth Balls] [Smart Living Moth Balls] combine an effective mothproofing ingredient with a fresh [lavender] [cedar] scent to create pleasant smelling, reliable moth balls. These pleasant smelling moth balls are wrapped in breathable paper packets, which allow the active ingredient to work while protecting your clothes from messy flakes or residue.]

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with labeling.

TO KILL CLOTHES MOTHS AND CARPET BEETLES

IMPORTANT: Keep out of reach of children. Do not place in areas accessible to children.

Use Restrictions: To kill clothes moths (larvae and adults) and carpet beetles in clean, air-tight containers (e.g. chests and trunks), garment bags, and storage closets. Do not use in containers, dry cleaning and garbage bags, or closets that allow vapors to escape into occupied rooms. Do not use this product with any other moth control chemical. Do not use in plastic storage containers or in contact with plastic items as paradichlorobenzene damages some plastics. For use only on cloth containing wool or wool blends in fabrics, silks, blended fabric, and furs.

Pre-Application Directions: Before storing, dry clean, wash or brush articles to be protected.

Application Directions: Apply product in clean, air-tight containers, bags and closets listed above at the following rates:

Use at rate of [1 box (4 oz) for each 13 cubic feet]

[1 box (5 oz) for each 16 cubic feet]

[1 box (6 oz) for each 19 cubic feet]

[1 box (8 oz) for each 25 cubic feet]

[1 box (10 oz) for each 30 cubic feet]

[1 box (12 oz) for each 38 cubic feet]

[1 box (14 oz) for each 44 cubic feet]

[1 box (20 oz) for each 63 cubic feet]

[1 box (24 oz) for each 75 cubic feet]

[Use Rates for Moth Ball Packets:

4 packets Small storage (3 cu.ft)

16 packets Average garment bag (12 cu.ft)

20 packets Large trunk (15 cu.ft)]

[To properly treat larger volumes, the use of additional containers of moth ball packets may be required. Use the specified amount of moth ball packets to ensure protection of your clothes. Do not remove the moth balls from the packets.] For larger closets, multiply the height, width, and depth of the space and divide by 50 to determine the number of pounds of product needed. For example, a closet 8 feet high, 4 feet wide, and 3 feet deep (i.e., 96 cubic feet) would need about 2 pounds of product ($96/50 = 1.9$).

Post-Application Directions: Keep product in air-tight space for a minimum of seven (7) days. Odor dissipates when treated articles are aired.

Retreatment: Since moths are active all year, replenish air-tight containers, bags, and closets 2 times a year.

[IMS Moth Balls] [Smart Living Moth Balls] will not harm the finest woolens, furs, silk, or other fabrics. Pleasant odor quickly vanishes when articles are aired.

Paradichlorobenzene moth balls must not be mixed or placed in contact with naphthalene moth balls or flakes, or other moth preventive products or chemicals.

Do not use plastic storage box or place in contact with plastic items as paradichlorobenzene damages some plastics.

Left Panel:

[Sold by:]/[Distributed by:]
[Name and address as appropriate]

Manufactured by:
IMS Trading, LLC
Los Angeles, CA
Made in China

Back Panel:

PRECAUTIONARY STATEMENTS

Hazards to humans and domestic animals.

WARNING: Causes substantial but temporary eye injury, skin, and respiratory tract irritation. Harmful if swallowed or absorbed through skin. Causes eye, skin, and respiratory irritation. Wear safety glasses. Do not get in eyes or on clothing. Avoid contact with skin. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

NOTICE: California has determined that a chemical contained in this product causes cancer based on tests performed on laboratory animals.

FIRST AID	
If Inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for further treatment advice.
If on Skin or Clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If In Eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first five minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
If Swallowed	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
HOTLINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the National Pesticide Information Center (NPIC) at 1-800-858-7378 for emergency medical treatment information.	
NOTE TO PHYSICIAN	
Possible mucosal damage may contraindicate the use of gastric lavage.	

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal

Pesticide Storage: Store only in original container in a cool dry place inaccessible to children and pets. Keep container closed and away from other chemicals.

Pesticide Disposal and Container Handling: Non-refillable container. Do not refill or reuse empty box or cellophane.

If Empty: Place in trash or offer for recycling, if available.

If Partly Filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

EPA Reg. No. 81433-2

EPA Est. 81217-CHN-001

Batch Number: _____

copy
showing
revision

Front Panel:

[Smart Living Moth Balls]
[IMS Moth Balls]
[Lavender Scented Moth Balls]
[Cedar Scented Moth Balls]
[Paper Covered Lavender Scented Moth Ball Packets]
[Paper Covered Cedar Scented Moth Ball Packets]

Kills Moths & Carpet Beetles

No Clinging Odor
Protects Clothing

When Used in Air-tight Containers This Product Can Treat Up to

~~[139.2 75 cu. ft (24 oz)]~~

~~[116 63 cu. ft (20 oz)]~~

~~[81.2 44 cu. ft (14 oz)]~~

~~[69.6 38 cu. ft (12 oz)]~~

~~[57 30 cu. ft (10 oz)]~~

~~[45.6 25 cu. ft (8 oz)]~~

~~[35 19 cu. ft (6 oz)]~~

~~[29 16 cu. ft (5 oz)]~~

~~[22.8 13 cu. ft (4 oz)]~~

Do not stamp

KEEP OUT OF REACH OF CHILDREN.

WARNING: See Side and Back Panel For Add'l Precautions

Ingredient Statement:

Active Ingredient: Paradichlorobenzene 99.5%

Other Ingredients: 0.5%

TOTAL: 100.0%

~~[Net Wt. 24 oz (680.4 g)]~~

~~[Net Wt. 20 oz (567 g)]~~

~~[Net Wt. 14 oz (396.9 g)]~~

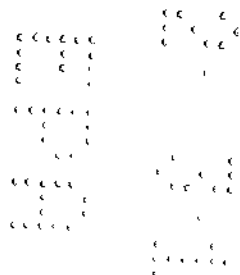
~~[Net Wt. 12 oz (340.2 g)]~~

~~[Net Wt. 10 oz (283.5g)]~~

~~[Net Wt. 6 oz (170.1g)]~~

~~[Net Wt. 5 oz (142.6g)]~~

~~[Net Wt. 4 oz (113.4g)]~~



[IMS Moth Balls] [Smart Living Moth Balls] provide protection for articles stored in clean, air tight containers (e.g., chests and trunks), garment bags, and storage closets drawers, boxes, etc. They should be sprinkled or placed on the bottom of the storage space, between the folds and layers of clothes, and on top before securely closing the container.

Right Side Panel:

[Protect in winter and summer and spring and fall.]

[[IMS Moth Balls] [Smart Living Moth Balls] were specially developed to provide the excellent protection of moth balls without the strong smell. [IMS Moth Balls] [Smart Living Moth Balls] combine an effective mothproofing ingredient with a fresh [lavender] [cedar] scent to create pleasant smelling, reliable moth balls. These pleasant smelling moth balls are wrapped in breathable paper packets, which allow the active ingredient to work while protecting your clothes from messy flakes or residue.]

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with labeling.

TO KILL CLOTHES MOTHS AND CARPET BEETLES

IMPORTANT: Keep out of reach of children. Do not place in areas accessible to children.

Use Restrictions: To kill clothes moths (larvae and adults) and carpet beetles in clean, air-tight containers (e.g. chests and trunks), garment bags, and storage closets. Do not use in containers, dry cleaning and garbage bags, or closets that allow vapors to escape into occupied rooms. Do not use this product with any other moth control chemical. Do not use in plastic storage containers or in contact with plastic items as paradichlorobenzene damages some plastics. For use only on cloth containing wool or wool blends in fabrics, silks, blended fabric, and furs.

Pre-Application Directions: Before storing, dry clean, wash or brush articles to be protected.

Application Directions: Apply product in clean, air-tight containers, bags and closets listed above at the following rates:

~~Thoroughly brush or clean articles to be stored.~~

Use at rate of [1 box (4 oz) for each ~~22.8~~ 13 cubic feet]
[1 box (5 oz) for each ~~29~~ 16 cubic feet]
[1 box (6 oz) for each ~~35~~ 19 cubic feet]
[1 box (8 oz) for each ~~46.4~~ 25 cubic feet]
[1 box (10 oz) for each ~~57~~ 30 cubic feet]
[1 box (12 oz) for each ~~69.6~~ 38 cubic feet]
[1 box (14 oz) for each ~~71.2~~ 44 cubic feet]
[1 box (20 oz) for each ~~116~~ 63 cubic feet]
[1 box (24 oz) for each ~~139.2~~ 75 cubic feet] ~~of tightly enclosed space.~~

[Use Rates for Moth Ball Packets:

43 packets Small storage (3 cu.ft)
162 packets Average garment bag (12 cu.ft)
2015 packets Large trunk (15 cu.ft)]

[To properly treat larger volumes, the use of additional containers of moth ball packets may be required. Use the specified amount of moth ball packets to ensure protection of your clothes. Do not remove the moth balls from the packets.] For larger closets, multiply the height, width, and depth of the space and divide by 50 to determine the number of pounds of product needed. For example, a closet 8 feet high, 4 feet wide, and 3 feet deep (i.e., 96 cubic feet) would need about 2 pounds of product ($96/50 = 1.9$).

Post-Application Directions: Keep product in air-tight space for a minimum of seven (7) days. Odor dissipates when treated articles are aired.

Retreatment: Since moths are active all year, replenish air-tight containers, bags, and closets 2 times a year.

~~Distribute [IMS Moth Balls] [Smart Living Moth Balls] evenly around and between the folds of stored articles. Be sure storage space is kept tightly closed at all times and for at least seven days after protecting with [IMS Moth Balls] [Smart Living Moth Balls]. Replace when moth balls have dissipated.~~

[IMS Moth Balls] [Smart Living Moth Balls] will not harm the finest woolens, furs, silk, or other fabrics. Pleasant odor quickly vanishes when articles are aired.

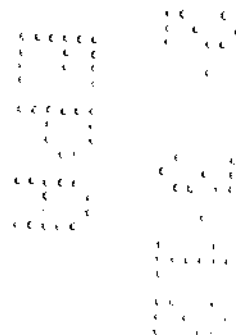
Paradichlorobenzene moth balls must not be mixed or placed in contact with naphthalene moth balls or flakes, or other moth preventive products or chemicals.

Do not use plastic storage box or place in contact with plastic items as paradichlorobenzene damages some plastics.

Left Panel:

[Sold by:]/[Distributed by:]
[Name and address as appropriate]

Manufactured by:
IMS Trading, LLC
Los Angeles, CA
Made in China



Back Panel:

PRECAUTIONARY STATEMENTS

Hazards to humans and domestic animals.

WARNING: Causes substantial but temporary eye injury, skin, and respiratory tract irritation. Harmful if swallowed or absorbed through skin. Causes eye, skin, and respiratory irritation. Wear safety glasses. Do not get in eyes or on clothing. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

NOTICE: California has determined that a chemical contained in this product causes cancer based on tests performed on laboratory animals.

~~Physical-Chemical Hazard. Combustible. Do not use or store near heat or open flame.~~

FIRST AID	
If Inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for further treatment advice.
If on Skin or Clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If In Eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first five minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
If Swallowed	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
HOTLINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the National Pesticide Information Center (NPIC) at 1-800-858-7378 for emergency medical treatment information.	
NOTE TO PHYSICIAN	
Possible mucosal damage may contraindicate the use of gastric lavage.	

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal

Pesticide Storage: Store only in original container in a cool dry place inaccessible to children and pets. Keep container closed and away from other chemicals.

Pesticide Disposal and Container Handling: Non-refillable container. Do not refill or reuse empty box or cellophane.

If Empty: Place in trash or offer for recycling, if available.

If Partly Filled: ~~For unused product, c~~ Call your local solid toxic waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

~~Container Handling: Non-refillable container. Do not refill or reuse empty box or cellophane. Offer for recycling, if available.~~

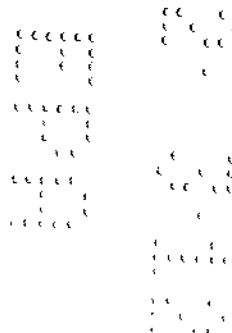
Notice:

~~California has determined that a chemical contained in this product causes cancer based on tests performed on laboratory animals.~~

EPA Reg. No. 81433-2

EPA Est. 81217-CHN-001

Batch Number: _____





IMS RE: IMS Moth Balls EPA Reg. No. 81433-2

Henry M. Jacoby, M.S. to: Dan Peacock

Cc: "Lynn L. Bergeson", "Sheryl L. Dolan"

02/02/2012 04:09 PM

Dan,

Attached is the resubmission for the IMS Moth Balls, EPA Reg. No. 81433-2, in response to your comments of November 16, 2011. The labels have been revised according the comments received and it is our expectation that this resubmission will be approved as expeditiously as possible. Due to marketing needs, the company would appreciate knowing the anticipated completion date for this resubmission.

Best regards,

Henry M. Jacoby, M.S.

THE ACTA GROUP, L.L.C.

2200 Pennsylvania Avenue, N.W.

Suite 100W

Washington, D.C. 20037-1701

[hjacob@actagroup.com](mailto:hjacoby@actagroup.com)

(301) 865-9090 (phone)

(202) 557-3836 (fax)

Please visit our Web Site at <http://www.actagroup.com>

This e-mail may contain confidential or privileged information. If you are not the intended recipient, please advise by



return e-mail and delete immediately without reading or forwarding to others. 00089536.PDF 00089535.PDF



00089534.PDF 00089533.PDF



SUSTAINABLE CHEMICAL PRODUCT
INNOVATION AND DEVELOPMENT

February 3, 2012

Via Hand Delivery

Document Processing Desk (AMEND)
Registration Support Branch
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

Re: Resubmission for IMS Moth Balls, EPA Reg. No. 81433-2, Submitted in
Response to EPA Comments Dated November 16, 2011

Dear Document Processing Officer:

On behalf of IMS Trading, LLC (IMS), The Acta Group, L.L.C. (Acta) is submitting the accompanying resubmission for the above-referenced product. This resubmission revises the label according to comments received from Mr. D. Peacock dated November 16, 2011. No changes have been made to the registration record other than revising the use directions as per EPA's directions.

Included with this submission are the following:

- EPA Form 8570-1;
- Five copies of the product label with proposed changes in redline; and
- Five copies of the product label with the proposed changes accepted.

{0983 001 / 111 / 00089395.DOC
2}
The Acta Group, L.L.C.
2200 Pennsylvania Avenue, N.W.
Suite 100W
Washington, D.C. 20037
TEL: 202/266-5020 • FAX: 202/557-3836
WEB: WWW.ACTAGROUP.COM

The Acta Group EU, Ltd
23 New Mount Street
Manchester M4 4DE
United Kingdom
TEL: +44 (0) 161 212 7405
WEB: WWW.ACTAGROUP.COM

Registered in England and Wales. No. 5307852
Registered office: The Acta Group EU Ltd
1st floor Northern Assurance Buildings
921 Princess Street, Manchester M2 4DN



SUSTAINABLE CHEMICAL PRODUCT
INNOVATION AND DEVELOPMENT

Document Processing Officer
February 3, 2012
Page 2

If you have any questions about this submission, please call either me at (202) 557-3815, Sheryl Lindros Dolan at (202) 557-3804, or Mr. Michael Ghesser, Chief Operating Officer of IMS, at (323) 938-8868.

Sincerely,

A handwritten signature in cursive script that reads "Henry M. Jacoby". The ink is dark and the signature is fluid, with a prominent loop at the end of the last name.

Henry M. Jacoby

Attachments

<div style="display: inline-block; vertical-align: middle; text-align: center;"> United States Environmental Protection Agency Washington, DC 20460 </div>		<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>	Registration Amendment Other	OPP Identifier Number				
		Application for Pesticide - Section I						
		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 40%; vertical-align: top;"> 1. Company/Product Number 81433-2 </td> <td style="width: 30%; vertical-align: top;"> 2. EPA Product Manager Dan Peacock </td> <td style="width: 30%; vertical-align: top;"> 3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted </td> </tr> <tr> <td style="vertical-align: top;"> 4. Company/Product (Name) IMS Moth Balls </td> <td style="vertical-align: top;"> PM# 7 </td> <td></td> </tr> </table>			1. Company/Product Number 81433-2	2. EPA Product Manager Dan Peacock	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted	4. Company/Product (Name) IMS Moth Balls
1. Company/Product Number 81433-2	2. EPA Product Manager Dan Peacock	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted						
4. Company/Product (Name) IMS Moth Balls	PM# 7							

5. Name and Address of Applicant (Include Zip Code) IMS Trading, LLC 6010 Wilshire Boulevard, Suite 400 Los Angeles, CA 90036 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____
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Section - II

<input type="checkbox"/> Amendment - Explain below. <input checked="" type="checkbox"/> Resubmission in response to Agency letter dated <u>11/16/2011</u> <input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other - Explain below.
--	---

Explanation Resubmission of label revised according EPA comments of Nov. 16, 2011.

Section - III

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Unit Packaging wgt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Package wgt No. per container	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) Cardboard box
* Certification must be submitted			

3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container	5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product
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6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled
--

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Henry M. Jacoby, M.S.	Title Agent	Telephone No. (Include Area Code) (301) 855-9090

Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Chief Operating Officer	
4. Typed Name Michael Ghesser	5. Date February 1, 2012	

Telephone Conversation

To: Harry Jacoby From: Dan Peacocks

12-21-2011

81433-2

Issue: Proper Rate

1 lb / 100 cu ft

or

1 lb / 50 cu ft

If registrant has
a problem with rate
of 1 lb / 50 cu ft, he
should make an argument
for a lower rate &
we will look at it again



Re: IMS Original Moth Balls RE: Additional Sizes EPA Reg. No 81433-2
Dan Peacock to: hjacoby

11/16/2011 01:32 PM

Dear Mr. Jacoby,

Below are my comments for this product. If you have any questions, let me know.

It would speed up the remainder of the review process if you could send me electronic copies of the 1) initial version and 2) revised version.

As soon as I have a revised, acceptable label, I can move to prepare the approval documents.

Thank You,

Decision # 457236

Daniel B. Peacock, Biologist
Tel: 703-305-5407
Fax: 703-308-0029
E-Mail: peacock.dan@epa.gov

300 5-906394
1135

Addresses:

United States Postal Service (USPS): USEPA, Insecticide-Rodenticide Branch, Registration Division (7504P), 1200 Pennsylvania Ave. NW, Washington, DC 20460-0001

Courier Deliveries: USEPA, Insecticide-Rodenticide Branch, Registration Division, Room S-4900, One Potomac Yard, 2777 Crystal Drive, Arlington, VA 22202

-----"Henry M. Jacoby, M.S." <hjacoby@actagroup.com> wrote: -----

To: Dan Peacock/DC/USEPA/US@EPA

From: "Henry M. Jacoby, M.S." <hjacoby@actagroup.com>

Date: 10/31/2011 03:31PM

Subject: IMS Original Moth Balls RE: Additional Sizes EPA Reg. No 81433-2

Dan,

Send the status on the above application to this email address.

Best regards,

Henry M. Jacoby, M.S.
THE ACTA GROUP, L.L.C.
2200 Pennsylvania Avenue, N.W.
Suite 100W
Washington, D.C. 20037-1701
hjacoby@actagroup.com
(301) 865-9090 (phone)
(202) 557-3836 (fax)

Please visit our Web Site at <http://www.actagroup.com>

This e-mail may contain confidential or privileged information. If you are not the intended recipient, please advise by return e-mail and delete immediately without reading or forwarding to others.



Comments on 81433-2, 11-16-2011.docx

Comments on 81433-2, November 16, 2011
Dan Peacock, Biologist, Insecticide-Rodenticide Branch

1. On the Front Panel, modify the end of the next to last sentence to read:

... for articles stored in clean, air tight containers (e.g., chests and trunks), garment bags, and storage closets.

2. Revise the "**Directions for Use**", as follows:

DIRECTIONS FOR USE

It is a violation of the Federal Law to use this product in a manner inconsistent with its labeling.

TO KILL CLOTHES MOTH AND CARPET BEETLES

IMPORTANT: Keep out of reach of children. Do not place in areas accessible to children.

Use Restrictions: To kill clothes moths (larvae and adults) and carpet beetles in clean, air-tight containers (e.g. chests and trunks), garment bags, and storage closets. Do not use in containers, dry cleaning and garbage bags, or closets that allow vapors to escape into occupied rooms. Do not use this product with any other moth control chemical. Do not use in plastic storage containers or in contact with plastic items as paradichlorobenzene damages some plastics. For use only on cloth containing wool or wool blends in fabrics and furs.

Pre-Application Directions: Before storing, dry clean, wash or brush articles to be protected.

Application Directions: Apply product in clean, air-tight containers, bags and closets listed above at the following rates:

<u>Pounds of Product</u>	<u>Area of Tightly Enclosed Space</u>
4 [# balls/sachets]	Average Garment Bag
1/3 [# balls/sachets]	Large Trunk
1	Small Closet (50 cubic feet)

For larger closets, multiply the height, width, and depth of the space and divide by 50 to determine the number of pounds of product needed. For example, a closet 8 feet high, 4 feet wide, and 3 feet deep (i.e. 96 cubic feet) would need about 2 pounds of product ($96/50=1.9$).

Post-Application Directions: Keep product in air-tight space for a minimum of seven (7) days. Odor dissipates when treated articles are aired.

Master Label for EPA Reg. No. 81433-2
Alternative Language Enclosed in Brackets []
Revised sizes
Revision: August 15, 2011

Comments
by Dan Peracik
11-16-2011

Marked
Copy

Front Panel:

[Smart Living] Moth Balls
[IMS Moth Balls]
[Lavender Scented Moth Balls]
[Cedar Scented Moth Balls]
[Paper Covered Lavender Scented Moth Ball Packets]
[Paper Covered Cedar Scented Moth Ball Packets]

Kills Moths & Carpet Beetles

No Clinging Odor
Protects Clothing

When Used in Air-tight Containers This Product Can Treat Up to

[139.2 cu. ft (24 oz)]

[116 cu. ft (20 oz)]

[81.2 cu. ft (14 oz)]

[69.6 cu. ft (12 oz)]

[57 cu. ft (10 oz)]

[45.6 cu. ft (8 oz)]

[35 cu. ft (6 oz)]

[29 cu. ft (5 oz)]

[22.8 cu. ft (4 oz)]

KEEP OUT OF REACH OF CHILDREN.

WARNING: See Side and Back Panel For Add'l Precautions

Ingredient Statement:

Active Ingredient: Paradichlorobenzene 99.5%

Other Ingredients: 0.5%

TOTAL: 100.0%

[Net Wt. 24 oz (680.4 g)]

[Net Wt. 20 oz (567 g)]

[Net Wt. 14 oz (396.9 g)]

[Net Wt. 12 oz (340.2 g)]

[Net Wt. 10 oz (283.5g)]

[Net Wt. 6 oz (170.1g)]

[Net Wt. 5 oz (142.6g)]

[Net Wt. 4 oz (113.4g)]

[IMS Moth Balls] [Smart Living Moth Balls] provide protection for articles stored in ~~trunks,~~
~~drawers, boxes, etc.~~ They should be sprinkled or placed on the bottom of the storage space,
between the folds and layers of clothes, and on top before securely closing the container.

clean, air tight
containers (e.g. trunks and
trucks) garment bags,
and storage chests

Right Side Panel:

[Protect in winter and summer and spring and fall.]

[[IMS Moth Balls] [Smart Living Moth Balls] were specially developed to provide the excellent protection of moth balls without the strong smell. [IMS Moth Balls] [Smart Living Moth Balls] combine an effective mothproofing ingredient with a fresh [lavender] [cedar] scent to create pleasant smelling, reliable moth balls. These pleasant smelling moth balls are wrapped in breathable paper packets, which allow the active ingredient to work while protecting your clothes from messy flakes or residue.]

Directions for Use

It is a violation of federal law to use this product in a manner inconsistent with labeling.

2

IMPORTANT: Keep out of reach of children. Do not place in areas accessible to children.

Thoroughly brush or clean articles to be stored. Use at rate of [1 box (4 oz) for each 22.8 cubic feet] [1 box (5 oz) for each 29 cubic feet] [1 box (6 oz) for each 35 cubic feet] [1 box (8 oz) for each 46.4 cubic feet] [1 box (10 oz) for each 57 cubic feet] [1 box (12 oz) for each 69.6 cubic feet] [1 box (14 oz) for each 81.2 cubic feet] [1 box (20 oz) for each 116 cubic feet] [1 box (24 oz) for each 139.2 cubic feet] of tightly enclosed space.

[Use Rates for Moth Ball Packets:

3 packets	Small storage (3 cu.ft)
12 packets	Average garment bag (12 cu.ft)
15 packets	Large trunk (15 cu.ft)]

[To properly treat larger volumes, the use of additional containers of moth ball packets may be required. Use the specified amount of moth ball packets to ensure protection of your clothes. Do not remove the moth balls from the packets.]

Distribute [IMS Moth Balls] [Smart Living Moth Balls] evenly around and between the folds of stored articles. Be sure storage space is kept tightly closed at all times and for at least seven days after protecting with [IMS Moth Balls] [Smart Living Moth Balls]. Replace when moth balls have dissipated.

[IMS Moth Balls] [Smart Living Moth Balls] will not harm the finest woolens, furs, silk, or other fabrics. Pleasant odor quickly vanishes when articles are aired.

Paradichlorobenzene moth balls must not be mixed or placed in contact with naphthalene moth balls or flakes, or other moth preventive products or chemicals.

Do not use plastic storage box or place in contact with plastic items as paradichlorobenzene damages some plastics.

Left Panel:

[Sold by:]/[Distributed by:]
[Name and address as appropriate]

Manufactured by:
IMS Trading, LLC
Los Angeles, CA
Made in China

Back Panel:

Precautionary Statements

Hazards to humans and domestic animals.

WARNING: Causes eye, skin, and respiratory tract irritation. Harmful if swallowed. Avoid contact with skin, eyes, or clothing.

Physical-Chemical Hazard. Combustible. Do not use or store near heat or open flame.

FIRST AID

If Swallowed -- Call a poison control center or doctor immediately for treatment advice.

Have person sip a glass of water if able to swallow.

Do not induce vomiting unless told to do so by a poison control center or doctor.

Do not give anything by mouth to an unconscious person.

If on Skin or Clothing -- Take off contaminated clothing.

Rinse skin immediately with plenty of water for 15-20 minutes.

Call a poison control center or doctor for treatment advice.

If Inhaled -- Move person to fresh air.

If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.

Call a poison control center or doctor for further treatment advice.

If In Eyes -- Hold eye open and rinse slowly and gently with water for 15-20 minutes.

Remove contact lenses, if present, after the first five minutes, then continue rinsing eye.

Call a poison control center or doctor for treatment advice.

HOTLINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the National Pesticide Information Center (NPIC) at 1-800-858-7378 for emergency medical treatment information.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

3

4

5

6

Handwritten signature

Pesticide Disposal: For unused product, call your local toxic waste agency for disposal instructions.

Notice:

per
EF
EF
Ba

Batch Number: _____



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

September 13, 2011

Decision # 453876

332 S - 901524
1300

IMS Trading, LLC
c/o The Acta Group, L.L.C.
Suite 100W
Washington, DC 20037

Attention: Mr. Henry Jacoby

Subject IMS Moth Balls
 EPA Reg. No. 81433-2
 Your Notification of August 15, 2011

Purpose The Agency has received your submission for Application for Pesticide Notification under Pesticide Registration Notice (PRN) 1998-10, to approve additional package size (from 4 ounces to 24 ounces).

Review The Registration Division (RD) has conducted a review of this request for its applicability under PRN 1998-10 and has found that the action (including changes to the label use directions) fails to fall within the scope of this PR notice but must be processed as a "**Regular Amendment**" in combination with our review with any current pending amendments.

Please be advised that the Agency issued PR Notice 1998-10 as guidance and not as regulations. Therefore, the Registration Division reserves the right to make the above determination, to disapprove this action, to cease processing it as a "**Notification**", and to process it as a "**Regular Amendment**". We have updated our records accordingly and will inform you of the results of our review, when completed.

Questions If you have questions about this letter, please contact me at 703-305-5407 (phone); 703-308-0029 (fax); or peacock.dan@epa.gov (E-Mail).

Sincerely,



Daniel B. Peacock, Biologist
Insecticide-Rodenticide Branch
Registration Division (7505P)

File Dan Peacock, C:\Documents and Settings\dpeacock\Desktop\Backup,
Location 16gb Flash Drive\Notifications\Letters\Letters DPeacock\81433-2. Not. 8-15-2011, ltr 9-13-2011.doc



SUSTAINABLE CHEMICAL PRODUCT
INNOVATION AND DEVELOPMENT

August 15, 2011

Via Hand Delivery

Document Processing Desk (AMEND)
Registration Support Branch
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

Re: Notification for IMS Moth Balls, EPA Reg. No. 81433-2, Submitted in
Accordance with PR Notice 98-10

Dear Document Processing Officer:

On behalf of IMS Trading, LLC (IMS), The Acta Group, L.L.C. (Acta) is submitting the accompanying amendment for the above-referenced product. This amendment is submitted for the addition of the other sizes of packaging, namely, 4-ounce, 8-ounce, 12-ounce, 14-ounce, 20-ounce, and 24-ounce containers. No changes have been made to the registration record other than adding appropriate use directions for the new container sizes that are proportional to the existing directions. This application is submitted as a notification as required by Section II M 1, Changes in Mixing Directions, which do not affect the dilution ratio or the minimum or maximum use dilution and Section II M 2, Addition of Tables, Charts, or Other Graphics, which present the same use directions already approved by the U.S. Environmental Protection Agency (EPA) in a narrative form.

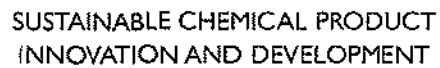
Included with this submission are the following:

- EPA Form 8570-1;
- ³Five copies of the product label with proposed changes in redline; and
- One copy of the product label with the proposed changes accepted.

The Acta Group, L.L.C.
2200 Pennsylvania Avenue, N.W.
Suite 100W
Washington, D.C. 20037
TEL: 202/266-5020 • FAX: 202/557-3836
WEB: WWW.ACTAGROUP.COM

The Acta Group EU, Ltd
23 New Mount Street
Manchester M4 4OE
United Kingdom
TEL: +44 (0) 161 212 7405
WEB: WWW.ACTAGROUP.COM

Registered in England and Wales, No. 5307852
Registered office: The Acta Group EU, Ltd
1st Floor, Northern Assurance Buildings,
921 Princess Street, Manchester M2 4 DN





If you have any questions about this submission, please call either me at (202) 557-3815, Sheryl Lindros Dolan at (202) 557-3804, or Mr. Michael Ghesser, Chief Operating Officer of IMS, at (323) 938-8868.

Henry M. Jacoby

Attachments

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100 101 102 103 104 105 106 107 108 109 110 111 112 113 114 115 116 117 118 119 120 121 122 123 124 125 126 127 128 129 130 131 132 133 134 135 136 137 138 139 140 141 142 143 144 145 146 147 148 149 150 151 152 153 154 155 156 157 158 159 160 161 162 163 164 165 166 167 168 169 170 171 172 173 174 175 176 177 178 179 180 181 182 183 184 185 186 187 188 189 190 191 192 193 194 195 196 197 198 199 200 201 202 203 204 205 206 207 208 209 210 211 212 213 214 215 216 217 218 219 220 221 222 223 224 225 226 227 228 229 230 231 232 233 234 235 236 237 238 239 240 241 242 243 244 245 246 247 248 249 250 251 252 253 254 255 256 257 258 259 260 261 262 263 264 265 266 267 268 269 270 271 272 273 274 275 276 277 278 279 280 281 282 283 284 285 286 287 288 289 290 291 292 293 294 295 296 297 298 299 300 301 302 303 304 305 306 307 308 309 310 311 312 313 314 315 316 317 318 319 320 321 322 323 324 325 326 327 328 329 330 331 332 333 334 335 336 337 338 339 340 341 342 343 344 345 346 347 348 349 350 351 352 353 354 355 356 357 358 359 360 361 362 363 364 365 366 367 368 369 370 371 372 373 374 375 376 377 378 379 380 381 382 383 384 385 386 387 388 389 390 391 392 393 394 395 396 397 398 399 400 401 402 403 404 405 406 407 408 409 410 411 412 413 414 415 416 417 418 419 420 421 422 423 424 425 426 427 428 429 430 431 432 433 434 435 436 437 438 439 440 441 442 443 444 445 446 447 448 449 450 451 452 453 454 455 456 457 458 459 460 461 462 463 464 465 466 467 468 469 470 471 472 473 474 475 476 477 478 479 480 481 482 483 484 485 486 487 488 489 490 491 492 493 494 495 496 497 498 499 500 501 502 503 504 505 506 507 508 509 510 511 512 513 514 515 516 517 518 519 520 521 522 523 524 525 526 527 528 529 530 531 532 533 534 535 536 537 538 539 540 541 542 543 544 545 546 547 548 549 550 551 552 553 554 555 556 557 558 559 560 561 562 563 564 565 566 567 568 569 570 571 572 573 574 575 576 577 578 579 580 581 582 583 584 585 586 587 588 589 590 591 592 593 594 595 596 597 598 599 600 601 602 603 604 605 606 607 608 609 610 611 612 613 614 615 616 617 618 619 620 621 622 623 624 625 626 627 628 629 630 631 632 633 634 635 636 637 638 639 640 641 642 643 644 645 646 647 648 649 650 651 652 653 654 655 656 657 658 659 660 661 662 663 664 665 666 667 668 669 670 671 672 673 674 675 676 677 678 679 680 681 682 683 684 685 686 687 688 689 690 691 692 693 694 695 696 697 698 699 700 701 702 703 704 705 706 707 708 709 710 711 712 713 714 715 716 717 718 719 720 721 722 723 724 725 726 727 728 729 730 731 732 733 734 735 736 737 738 739 740 741 742 743 744 745 746 747 748 749 750 751 752 753 754 755 756 757 758 759 760 761 762 763 764 765 766 767 768 769 770 771 772 773 774 775 776 777 778 779 780 781 782 783 784 785 786 787 788 789 790 791 792 793 794 795 796 797 798 799 800 801 802 803 804 805 806 807 808 809 810 811 812 813 814 815 816 817 818 819 820 821 822 823 824 825 826 827 828 829 830 831 832 833 834 835 836 837 838 839 840 841 842 843 844 845 846 847 848 849 850 851 852 853 854 855 856 857 858 859 860 861 862 863 864 865 866 867 868 869 870 871 872 873 874 875 876 877 878 879 880 881 882 883 884 885 886 887 888 889 890 891 892 893 894 895 896 897 898 899 900 901 902 903 904 905 906 907 908 909 910 911 912 913 914 915 916 917 918 919 920 921 922 923 924 925 926 927 928 929 930 931 932 933 934 935 936 937 938 939 940 941 942 943 944 945 946 947 948 949 950 951 952 953 954 955 956 957 958 959 960 961 962 963 964 965 966 967 968 969 970 971 972 973 974 975 976 977 978 979 980 981 982 983 984 985 986 987 988 989 990 991 992 993 994 995 996 997 998 999 1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011 1012 1013 1014 1015 1016 1017 1018 1019 1020 1021 1022 1023 1024 1025 1026 1027 1028 1029 1030 1031 1032 1033 1034 1035 1036 1037 1038 1039 104

 <div style="display: inline-block; text-align: center;"> United States Environmental Protection Agency Washington, DC 20460 </div>		<div style="border: 1px solid black; padding: 2px; margin-bottom: 2px;">Registration</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 2px;">Amendment</div> <div style="border: 1px solid black; padding: 2px;">X Other</div>	OPP Identifier Number
Application for Pesticide - Section I			
1. Company/Product Number 81433-2		2. EPA Product Manager John Hebert	
4. Company/Product (Name) IMS Moth Balls		3. Proposed Classification PM# 7 <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted	
5. Name and Address of Applicant (Include Zip Code) IMS Trading, LLC 6010 Wilshire Boulevard, Suite 400 Los Angeles, CA 90036 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	
Section - II			
<input type="checkbox"/> Amendment - Explain below.		<input type="checkbox"/> Final printed labels in response to Agency letter dated _____	
<input type="checkbox"/> Resubmission in response to Agency letter dated _____		<input type="checkbox"/> "Me Too" Application.	
<input checked="" type="checkbox"/> Notification - Explain below.		<input type="checkbox"/> Other - Explain below.	
Explanation: Use additional page(s) if necessary. (For Section I and Section II.) Notification of additional container sizes pursuant to PR Notice 98-10. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 C.F.R. § 152.46, and no other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C. § 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 C.F.R. § 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under Sections 12 and 14 of FIFRA.			
Section - III			
1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Unit Packaging wgt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Package wgt No. per container	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) Cardboard box
* Certification must be submitted			
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container	
		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other			
Section - IV			
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Henry M. Jacoby, M.S.		Title Agent Telephone No. (Include Area Code) (301) 865-9090	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Chief Operating Officer	
4. Typed Name Michael Ghesser		5. Date August 15, 2011	



81433-2: IMS Moth Balls
Julie Chao to: hjacoby

07/16/2010 01:44 PM

Hi Henry,

On September 28, 2007, a notification was submitted by you to change the nominal concentration of EPA Reg. No. 81433-2 from 99.8% to 99.5%. This probably should not have been accepted by notification (as the CSF for the product reflects a nominal concentration of 99.8%), but it was. At any rate, we were contacted by a State about this discrepancy, so the CSF record now needs to be updated accordingly.

Can you please submit, through our front end, updated copies of your CSF to reflect the correct nominal concentration of your product, which according to your label is 99.5%?

Thanks,
Julie

+++++

Julie Chao
703.308.8735 (phone)
703.305.6920 (fax)
<http://www.epa.gov/pesticides>



U.S. Environmental Protection Agency State Label Issue Tracking System

[EPA Home](#) > [OPP Home](#) > Response

Response

Requester: Jeanine Broughel (jbrough@gw.dec.state.ny.us)
Entity/Affiliation: New York **Request Date:** 06/21/2010 **Due Date:** 06/28/2010
Product #: 081433-00002
Product Name: IMS MOTH BALLS
PC Code: 061501 Paradichlorobenzene
OPP Team: RM 01
Risk Managers: Venus Eagle; John Hebert (eagle.venus@epa.gov; hebert.john@epa.gov)
Subject: Label Inconsistencies
Brief Desc: The percentage of active ingredient has been changed on the most current EPA stamped "accepted with comments" label dated March 8, 2010.
Detailed Desc: A notification was submitted to the EPA in 2007 to change the percentage of active and inert ingredients. The active ingredient was changed from 99.8 to 99.5, and the inerts were changed from 0.2 to 0.5. However, various lines of text were crossed out on the notification and the submission was marked as a "revised label."
Was this change accepted by the EPA? What is the correct percentage of active and inert ingredients for this product and was an updated CSF submitted to support the changes?
Thanks for your help.
Jeanine Broughel

Response Information

Responder: John Hebert (hebert.john@epa.gov)
Response Date: 06/25/2010

Response: Jeanine - The 2007 notification should have not been accepted. There was no CSF submitted to support the changes in the ingredient statement. And any changes to the nominal concentration should be submitted as an amendment. However, we would still consider the label statement from the March 8, 2010 label to be correct/current. We will contact the registrant for a revised CSF to reflect the ingredient label claims. Thanks for bringing this to our attention.

[OPP Home](#) | [Search OPP](#) | [Search for Product Label](#) | [Search SLITS](#) | [SLITS Registration](#) | [SLITS User Manual](#)

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Last updated on 06/25/2010 01:00:44 PM

URL: <https://yosemite.epa.gov/OPP/SLITS.nsf/904ea33bcd08d4685256d510008ceff?OpenForm&ParentUNID=FE4EE5658278661B85257749005765F9>

Julie - Sorry, but can you follow-up on this. The '07 notification should not have been accepted. We need a new/revised CSF that matches the label ingredient statement. Thanks.



CHEMICAL PRODUCT DEVELOPMENT
AND DEFENSE

March 11, 2010

Via Hand Delivery

Document Processing Desk (AMEND)
Registration Support Branch
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

RE: Final Printed Labels for IMS Moth Balls, EPA Reg. No. 81433-2
Submitted in Accordance with EPA Letter Dated March 8, 2010

Dear Document Processing Officer:

On behalf of IMS Trading, L.L.C. (IMS), The Acta Group, L.L.C. (Acta) is submitting two copies of the final printed label corrected according to the U.S. Environmental Protection Agency's approval letter dated March 8, 2010.

Included with this submission are the following:

- EPA Form 8570-1; and
- Two copies of the final printed product label.

If you have any questions about this submission, please call either me at (202) 557-3815, Sheryl Lindros Dolan at (202) 557-3804, or Mr. Isaac M. Shapiro, President of IMS, at (323) 938-8868.

Sincerely,

Henry M. Jacoby


Attachment

The Acta Group, L.L.C.
1203 Nineteenth Street, N.W.
Suite 300
Washington, D.C. 20036
TEL: 202/266-5020 • FAX: 202/557-3836
WEB: WWW.ACTAGROUP.COM

The Acta Group EU, Ltd
Avanta Royal Mills
17 Redhal Street
Ancoats Urban Village
Manchester M4 5BA

TEL: +44 (0) 161 216 4260 • FAX: +44 (0) 161 216 4261
WEB: WWW.ACTAGROUP.COM

Registered in England and Wales, No. 5307852
Registered office: The Acta Group EU, Ltd
1st Floor, Northern Assurance Buildings,
921 Princess Street, Manchester M2 4 DN

	United States	Registration Amendment Other	OPP Identifier Number	
	Environmental Protection Agency			X
	Washington, DC 20460			

Application for Pesticide - Section I

1. Company/Product Number 81433-2	2. EPA Product Manager Kable (Bo) Davis	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) IMS Moth Balls	PM# 7	
5. Name and Address of Applicant (Include Zip Code) IMS Trading, L.L.C. 6010 Wilshire Boulevard, Suite 503 Los Angeles, CA 90036 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated <u>March 8, 2010</u>
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.


Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Submission of final printed label.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) Cardboard box		
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled					

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Henry M. Jacoby, M.S.		Title Agent		Telephone No. (Include Area Code) (202) 557-3815	
Certification I certify that the statements I have made on this form and all attachments hereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title President			
4. Typed Name Isaac M. Shapiro		5. Date March 11, 2010			

Front Panel:

[Smart Living Moth Balls]
[IMS Moth Balls]
[Lavender Scented Moth Balls]
[Cedar Scented Moth Balls]
[Paper Covered Lavender Scented Moth Ball Packets]
[Paper Covered Cedar Scented Moth Ball Packets]

NOT REVIEWED
In Accordance with PR Notice 82-2
Revision on Draft Labeling Dated

Kills Moths & Carpet Beetles

No Clinging Odor
Protects Clothing

When Used in Air-tight Containers This Product Can Treat Up to
[57 cu.ft (10 oz)]
[35 cu.ft (6 oz)]
[29 cu.ft (5 oz)]

KEEP OUT OF REACH OF CHILDREN.

WARNING: See Side and Back Panel For Add'l Precautions

Ingredient Statement:

Active Ingredient: Paradichlorobenzene	99.5%
Other Ingredients:	0.5%
TOTAL:	100.0%

[Net Wt. 10 oz (283.5g)]
[Net Wt. 6 oz (171.2g)]
[Net Wt. 5 oz (142.6g)]

[IMS Moth Balls] [Smart Living Moth Balls] provide protection for articles stored in trunks, drawers, boxes, etc. They should be sprinkled or placed on the bottom of the storage space, between the folds and layers of clothes, and on top before securely closing the container.

Right Side Panel:

[Protect in winter and summer and spring and fall.]

[[IMS Moth Balls] [Smart Living Moth Balls] were specially developed to provide the excellent protection of moth balls without the strong smell. [IMS Moth Balls] [Smart Living Moth Balls] combine an effective mothproofing ingredient with a fresh [lavender] [cedar] scent to create pleasant smelling, reliable moth balls. These pleasant smelling moth balls are wrapped in breathable paper packets, which allow the active ingredient to work while protecting your clothes from messy flakes or residue.]

Directions for Use

It is a violation of federal law to use this product in a manner inconsistent with labeling.

IMPORTANT: Keep out of reach of children. Do not place in areas accessible to children.

Thoroughly brush or clean articles to be stored. Use at rate of [1 box (5 oz) for each 29 cubic feet] [1 box (6 oz) for each 35 cubic feet] [1 box (10 oz) for each 57 cubic feet] of tightly enclosed space.

[Use Rates for Moth Ball Packets:

3 packets Small storage (3 cu.ft)

12 packets Average garment bag (12 cu.ft)

15 packets Large trunk (15 cu.ft)]

[To properly treat larger volumes, the use of additional containers of moth ball packets may be required. Use the specified amount of moth ball packets to ensure protection of your clothes. Do not remove the moth balls from the packets.]

Distribute [IMS Moth Balls] [Smart Living Moth Balls] evenly around and between the folds of stored articles. Be sure storage space is kept tightly closed at all times and for at least 7 days after protecting with [IMS Moth Balls] [Smart Living Moth Balls]. Replace when moth balls have dissipated.

[IMS Moth Balls] [Smart Living Moth Balls] will not harm the finest woolens, furs, silk, or other fabrics. Pleasant odor quickly vanishes when articles are aired.

Paradichlorobenzene moth balls must not be mixed or placed in contact with Naphthalene moth balls or flakes, or other moth preventive products or chemicals.

Do not use plastic storage box or place in contact with plastic items as paradichlorobenzene damages some plastics.

Left Panel:

[Sold by:]/[Distributed by:]

[Name and address as appropriate]

Manufactured by:
IMS Trading, L.L.C.
Los Angeles, CA
Made in China

Back Panel:

Precautionary Statements

Hazards to humans and domestic animals.

WARNING: Causes eye, skin, and respiratory tract irritation. Harmful if swallowed. Avoid contact with skin, eyes, or clothing.

Physical-Chemical Hazard. Combustible. Do not use or store near heat or open flame.

FIRST AID

If Swallowed - Call a poison control center or doctor immediately for treatment advice.

Have person sip a glass of water if able to swallow.

Do not induce vomiting unless told to do so by a poison control center or doctor.

Do not give anything by mouth to an unconscious person.

If on Skin or Clothing - Take off contaminated clothing.

Rinse skin immediately with plenty of water for 15-20 minutes.

Call a poison control center or doctor for treatment advice.

If Inhaled - Move person to fresh air.

If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.

Call a poison control center or doctor for further treatment advice.

If In Eyes - Hold eye open and rinse slowly and gently with water for 15-20 minutes.

Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

Call a poison control center or doctor for treatment advice.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the National Pesticide Information Center (NPIC) at 1-800-858-7378 for emergency medical treatment information.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

Storage and Disposal

Pesticide Storage: Store in original container in a dry place inaccessible to children and pets.

Pesticide Disposal: For unused product, call your local toxic waste agency for disposal instructions.

Container Handling: Non-refillable container. Do not refill or reuse empty box or cellophane. Offer for recycling, if available.

Master Label for EPA Reg. No. 81433-2
Alternative Language Enclosed in Brackets []
Final Printed Label
Revision: March 11, 2010

Notice:

California has determined that a chemical contained in this product causes cancer based on tests performed on laboratory animals.

EPA Reg. No. 81433-2

EPA Est. 81217-CHN-001

Batch Number: _____

Front Panel:

[Smart Living Moth Balls]
[IMS Moth Balls]
[Lavender Scented Moth Balls]
[Cedar Scented Moth Balls]
[Paper Covered Lavender Scented Moth Ball Packets]
[Paper Covered Cedar Scented Moth Ball Packets]

Kills Moths & Carpet Beetles

No Clinging Odor
Protects Clothing

When Used in Air-tight Containers This Product Can Treat Up to
[57 cu.ft (10 oz)]
[35 cu.ft (6 oz)]
[29 cu.ft (5 oz)]

KEEP OUT OF REACH OF CHILDREN.

WARNING: See Side and Back Panel For Add'l Precautions

Ingredient Statement:

Active Ingredient: Paradichlorobenzene	99.5%
Other Ingredients:	0.5%
TOTAL:	100.0%

[Net Wt. 10 oz (283.5g)]
[Net Wt. 6 oz (171.2g)]
[Net Wt. 5 oz (142.6g)]

[IMS Moth Balls] [Smart Living Moth Balls] provide protection for articles stored in trunks, drawers, boxes, etc. They should be sprinkled or placed on the bottom of the storage space, between the folds and layers of clothes, and on top before securely closing the container.

Right Side Panel:

[Protect in winter and summer and spring and fall.]

[[IMS Moth Balls] [Smart Living Moth Balls] were specially developed to provide the excellent protection of moth balls without the strong smell. [IMS Moth Balls] [Smart Living Moth Balls] combine an effective mothproofing ingredient with a fresh [lavender] [cedar] scent to create a pleasant smelling, reliable moth balls. These pleasant smelling moth balls are wrapped in breathable paper packets, which allow the active ingredient to work while protecting your clothes from messy flakes or residue.]

Directions for Use

It is a violation of federal law to use this product in a manner inconsistent with labeling.

IMPORTANT: Keep out of reach of children. Do not place in areas accessible to children.

Thoroughly brush or clean articles to be stored. Use at rate of [1 box (5 oz) for each 29 cubic feet] [1 box (6 oz) for each 35 cubic feet] [1 box (10 oz) for each 57 cubic feet] of tightly enclosed space.

[Use Rates for Moth Ball Packets:

3 packets	Small storage (3 cu.ft)
12 packets	Average garment bag (12 cu.ft)
15 packets	Large trunk (15 cu.ft)]

[To properly treat larger volumes, the use of additional containers of moth ball packets may be required. Use the specified amount of moth ball packets to ensure protection of your clothes. Do not remove the moth balls from the packets.]

Distribute [IMS Moth Balls] [Smart Living Moth Balls] evenly around and between the folds of stored articles. Be sure storage space is kept tightly closed at all times and for at least 7 days after protecting with [IMS Moth Balls] [Smart Living Moth Balls]. Replace when moth balls have dissipated.

[IMS Moth Balls] [Smart Living Moth Balls] will not harm the finest woolens, furs, silk, or other fabrics. Pleasant odor quickly vanishes when articles are aired.

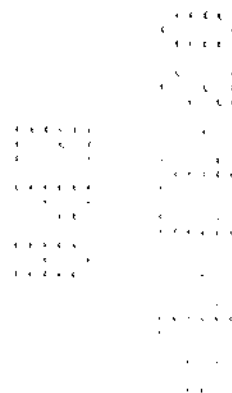
Paradichlorobenzene moth balls must not be mixed or placed in contact with Naphthalene moth balls or flakes, or other moth preventive products or chemicals.

Do not use plastic storage box or place in contact with plastic items as paradichlorobenzene damages some plastics.

Left Panel:

[Sold by:]/[Distributed by:]
[Name and address as appropriate]

Manufactured by:
IMS Trading, L.L.C.
Los Angeles, CA
Made in China



Back Panel:

Precautionary Statements

Hazards to humans and domestic animals.

WARNING: Causes eye, skin, and respiratory tract irritation. Harmful if swallowed. Avoid contact with skin, eyes, or clothing.

Physical-Chemical Hazard. Combustible. Do not use or store near heat or open flame.

FIRST AID

If Swallowed - Call a poison control center or doctor immediately for treatment advice.

Have person sip a glass of water if able to swallow.

Do not induce vomiting unless told to do so by a poison control center or doctor.

Do not give anything by mouth to an unconscious person.

If on Skin or Clothing - Take off contaminated clothing.

Rinse skin immediately with plenty of water for 15-20 minutes.

Call a poison control center or doctor for treatment advice.

If Inhaled - Move person to fresh air.

If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.

Call a poison control center or doctor for further treatment advice.

If In Eyes - Hold eye open and rinse slowly and gently with water for 15-20 minutes.

Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

Call a poison control center or doctor for treatment advice.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the National Pesticide Information Center (NPIC) at 1-800-858-7378 for emergency medical treatment information.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

Storage and Disposal

Pesticide Storage: Store in original container in a dry place inaccessible to children and pets.

Pesticide Disposal: For unused product, call your local toxic waste agency for disposal instructions.

Container Handling: Non-refillable container. Do not refill or reuse empty box or cellophane. Offer for recycling, if available.

Master Label for EPA Reg. No. 81433-2
Alternative Language Enclosed in Brackets []
Final Printed Label
Revision: March 11, 2010

Notice:

California has determined that a chemical contained in this product causes cancer based on tests performed on laboratory animals.

EPA Reg. No. 81433-2

EPA Est. 81217-CHN-001

Batch Number: _____

14/B/1/3

MATERIAL TO BE ADDED TO JACKET

REG # 81433-2

Description: PR Notice 98-10 changes

check all that apply	
<input type="checkbox"/>	new stamped accepted label
<input type="checkbox"/>	new CSF
<input checked="" type="checkbox"/>	notification

Send to CSC

Instructions:

Attach this sheet to the top of **ALL** material sent to the file room (both loose paper and new material in jackets). This sheet will be imaged; a clear description will aid in finding material in the e-jacket. Remove staples from all material. If returning loose paper then hold together with a binder or paper clip. CSFs should be placed in the CSF folder (if returning jacket) or covered with a red CBI sheet (if returning loose paper). Material to be returned to file room should be place in the appropriate bin.

Reviewer's Name: Sherada Hobgood

Date: _____

Phone: 703-308-8893

Division: RD

Front Panel:

IMS Moth Balls
[Lavender Scented Moth Balls]
[Cedar Scented Moth Balls]
[Paper Covered Lavender Scented Moth Ball Packets]
[Paper Covered Cedar Scented Moth Ball Packets]

Kills Moths & Carpet Beetles

No Clinging Odor
Protects Clothing

When Used in Air-tight Containers This Product Can Treat Up to
[57 cu.ft (10 oz)]
[35 cu.ft (6 oz)]
[29 cu.ft (5 oz)]

KEEP OUT OF REACH OF CHILDREN.

WARNING: See Side and Back Panel For Addt'l Precautions

Ingredient Statement:

Active Ingredient: Paradichlorobenzene 99.5%
Other Ingredients: 0.5%
TOTAL: 100.0%

[Net Wt. 10 oz (283.5g)]
[Net Wt. 6 oz (171.2g)]
[Net Wt. 5 oz (142.6g)]

IMS Moth Balls provide protection for articles stored in trunks, drawers, boxes, etc. They should be sprinkled or placed on the bottom of the storage space, between the folds and layers of clothes, and on top before securely closing the container.

Right Side Panel:

[Protect in winter and summer and spring and fall.]

[IMS Moth Ball Packets were specially developed to provide the excellent protection of moth balls without the strong smell and unwanted residue. IMS Moth Ball Packets combine an effective mothproofing ingredient with a fresh [lavender] [cedar] scent to create pleasant smelling, reliable moth balls. These pleasant smelling moth balls are wrapped in breathable paper packets, which allow the active ingredient to work while protecting you and your clothes from messy flakes or residue.]

Directions for Use

It is a violation of federal law to use this product in a manner inconsistent with labeling.

Thoroughly brush or clean articles to be stored. Use at rate of [1 box (5 oz) for each 29 cubic feet] [1 box (6 oz) for each 35 cubic feet] [1 box (10 oz) for each 57 cubic feet] of tightly enclosed space.

[Sample Use Rates for Moth Ball Packets:

3 packets	Small storage (3 cu.ft)
12 packets	Average garment bag (12 cu.ft)
15 packets	Large trunk (15 cu.ft)]

[To properly treat larger volumes, the use of additional containers of moth ball packets may be required. Use the recommended amount of moth ball packets to ensure protection of your clothes. Do not remove the moth balls from the packets.]

Distribute IMS Moth Balls evenly around and between the folds of stored articles. Be sure storage space is kept tightly closed at all times and for at least 7 days after protecting with IMS Moth Balls. Replace when moth balls have dissipated.

IMS Moth Balls will not harm the finest woolens, furs, silk, or other fabrics. Pleasant odor quickly vanishes when articles are aired.

Paradichlorobenzene moth balls should not be mixed or placed in contact with Naphthalene moth balls or flakes.

Do not use plastic storage box or place in contact with plastic items as paradichlorobenzene damages some plastics.

Left Panel:

Distributed by:
IMS Trading, LLC
Los Angeles, CA
Made in China

Back Panel:

Precautionary Statements

Hazards to humans and domestic animals.

OCT 25 2007

WARNING: Causes eye, skin, and respiratory tract irritation. Harmful if swallowed. Avoid contact with skin, eyes, or clothing.

Physical-Chemical Hazard. Combustible. Do not use or store near heat or open flame.

FIRST AID

If Swallowed - Call a poison control center or doctor immediately for treatment advice.

Have person sip a glass of water if able to swallow.

Do not induce vomiting unless told to do so by a poison control center or doctor.

Do not give anything by mouth to an unconscious person.

If on Skin or Clothing - Take off contaminated clothing.

Rinse skin immediately with plenty of water for 15-20 minutes.

Call a poison control center or doctor for treatment advice.

If Inhaled - Move person to fresh air.

If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.

Call a poison control center or doctor for further treatment advice.

If In Eyes - Hold eye open and rinse slowly and gently with water for 15-20 minutes.

Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

Call a poison control center or doctor for treatment advice.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the National Pesticide Information Center (NPIC) at 1-800-858-7378 for emergency medical treatment information.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

Storage and Disposal

Do not reuse empty box or cellophane. Wrap container and put in trash.

Notice:

California has determined that a chemical contained in this product causes cancer based on tests performed on laboratory animals.

EPA Reg. No. 81433-2

EPA Est. 81217-CHN-001

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
PREVENTION, PESTICIDES,
AND TOXIC SUBSTANCES

March 8, 2010

Mr. Henry M. Jacoby
IMS Trading, LLC
6010 Wilshire Boulevard, Suite 503
Los Angeles, CA 90036

Dear Mr. Jacoby:

Subject: Amended labeling to add an alternate brand name and make other minor changes
IMS Moth Balls
EPA Registration No. 81433-2
Submission dated February 24, 2010

The amended labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable with the following comments:

- On page 1, from the right side panel, delete the phrase "and unwanted residue" so the statement reads, "...provide the excellent protection of moth balls without the strong smell." (Claims about the lack of residue are considered implied safety claims, and are not permissible.)
- On page 1, from the right side panel, delete the phrase "you and" from the last statement so it reads, "...allow the active ingredient to work while protecting your clothes from messy flakes or residue." (Claims that the product protects people are considered implied safety claims, and are not permissible.)
- On page 2, under the directions for use, delete the word "sample" from the use rate directions. (The word "sample" implies that the rates are advisory, not mandatory, and may lead people to overuse the product.)
- On page 2, replace the word "recommended" with "specified" in the directions underneath the use rates so the sentence reads, "Use the specified amount of moth balls..." (The word "recommended" implies that the rates are advisory, not mandatory, and may lead people to overuse the product.)

- On page 2, under the directions for use, replace the word "should" with "must" and add the following text so the second to last statement reads, "Paradichlorobenzene moth balls must not be mixed or placed in contact with Napthalene moth balls or flakes, or other moth preventive products or chemicals." (The word "should" implies that this restriction is advisory, not mandatory.)

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on non-refillable containers. The code may appear either on the label or durably marked on the container itself. This information can be added by non-notification per PR Notice 98-10.

A stamped copy of the label is enclosed for your records. The alternate brand name "Smart Living Moth Balls" has been added to our records. Please submit two copies of your final printed labeling before you release the product for shipment. Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). If you have any questions, please contact me by phone at: (703) 308-8735, or by email at: chao.julie@epa.gov.

Sincerely,



Julie A. Chao
Insecticide-Rodenticide Branch
Registration Division (7505P)

Enclosure

Front Panel:

[Smart Living Moth Balls]
[IMS Moth Balls]
[Lavender Scented Moth Balls]
[Cedar Scented Moth Balls]
[Paper Covered Lavender Scented Moth Ball Packets]
[Paper Covered Cedar Scented Moth Ball Packets]

Kills Moths & Carpet Beetles

No Clinging Odor
Protects Clothing

When Used in Air-tight Containers This Product Can Treat Up to
[57 cu.ft (10 oz)]
[35 cu.ft (6 oz)]
[29 cu.ft (5 oz)]

KEEP OUT OF REACH OF CHILDREN.

WARNING: See Side and Back Panel For Addt'l Precautions

Ingredient Statement:

Active Ingredient: Paradichlorobenzene	99.5%
Other Ingredients:	0.5%
TOTAL:	100.0%

[Net Wt. 10 oz (283.5g)]
[Net Wt. 6 oz (171.2g)]
[Net Wt. 5 oz (142.6g)]

ACCEPTED
With COMMENTS
in EPA Letter Dated:
MAR - 8 2010
Under the Federal Insecticide, Fungicide
and Rodenticide Act, As amended, for the
pesticide Registered under EPA Reg. No:

81433-2

[IMS Moth Balls] [Smart Living Moth Balls] provide protection for articles stored in trunks, drawers, boxes, etc. They should be sprinkled or placed on the bottom of the storage space, between the folds and layers of clothes, and on top before securely closing the container.

Right Side Panel:

[protect in winter and summer and spring and fall.]

[[IMS Moth Balls] [Smart Living Moth Balls] were specially developed to provide the excellent protection of moth balls without the strong smell and unwanted residue. [IMS Moth Balls] [Smart Living Moth Balls] combine an effective mothproofing ingredient with a fresh [lavender] [cedar] scent to create pleasant smelling, reliable moth balls. These pleasant smelling moth balls are wrapped in breathable paper packets, which allow the active ingredient to work while protecting you and your clothes from messy flakes or residue.]

Directions for Use

It is a violation of federal law to use this product in a manner inconsistent with labeling.

IMPORTANT: Keep out of reach of children. Do not place in areas accessible to children.

Thoroughly brush or clean articles to be stored. Use at rate of [1 box (5 oz) for each 29 cubic feet] [1 box (6 oz) for each 35 cubic feet] [1 box (10 oz) for each 57 cubic feet] of tightly enclosed space.

[Sample Use Rates for Moth Ball Packets:

3 packets	Small storage (3 cu.ft)
12 packets	Average garment bag (12 cu.ft)
15 packets	Large trunk (15 cu.ft)]

[To properly treat larger volumes, the use of additional containers of moth ball packets may be required. Use the recommended amount of moth ball packets to ensure protection of your clothes. Do not remove the moth balls from the packets.]

Distribute [IMS Moth Balls] [Smart Living Moth Balls] evenly around and between the folds of stored articles. Be sure storage space is kept tightly closed at all times and for at least 7 days after protecting with [IMS Moth Balls] [Smart Living Moth Balls]. Replace when moth balls have dissipated.

[IMS Moth Balls] [Smart Living Moth Balls] will not harm the finest woolens, furs, silk, or other fabrics. Pleasant odor quickly vanishes when articles are aired.

Paradichlorobenzene moth balls should not be mixed or placed in contact with Naphthalene moth balls or flakes.

Do not use plastic storage box or place in contact with plastic items as paradichlorobenzene damages some plastics.

Left Panel:

[Sold by:]/[Distributed by:]
[Name and address as appropriate]

Manufactured by:
IMS Trading, LLC
Los Angeles, CA
Made in China

Back Panel:

Precautionary Statements

Hazards to humans and domestic animals.

WARNING: Causes eye, skin, and respiratory tract irritation. Harmful if swallowed. Avoid contact with skin, eyes, or clothing.

Physical-Chemical Hazard. Combustible. Do not use or store near heat or open flame.

FIRST AID

If Swallowed - Call a poison control center or doctor immediately for treatment advice.

Have person sip a glass of water if able to swallow.

Do not induce vomiting unless told to do so by a poison control center or doctor.

Do not give anything by mouth to an unconscious person.

If on Skin or Clothing - Take off contaminated clothing.

Rinse skin immediately with plenty of water for 15-20 minutes.

Call a poison control center or doctor for treatment advice.

If Inhaled - Move person to fresh air.

If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.

Call a poison control center or doctor for further treatment advice.

If In Eyes - Hold eye open and rinse slowly and gently with water for 15-20 minutes.

Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

Call a poison control center or doctor for treatment advice.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the National Pesticide Information Center (NPIC) at 1-800-858-7378 for emergency medical treatment information.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

Storage and Disposal

Pesticide Storage: Store in original container in a dry place inaccessible to children and pets.

Pesticide Disposal: For unused product, call your local toxic waste agency for disposal instructions.

Container Handling: Non-refillable container. Do not refill or reuse empty box or cellophane. Offer for recycling, if available.

Master Label for EPA Reg. No. 81433-2
Alternative Language Enclosed in Brackets []
Revision: February 24, 2010

Notice:

California has determined that a chemical contained in this product causes cancer based on tests performed on laboratory animals.

EPA Reg. No. 81433-2

EPA Est. 81217-CHN-001

Batch Number: _____



CHEMICAL PRODUCT DEVELOPMENT
AND DEFENSE

February 24, 2010

Via Hand Delivery

Document Processing Desk (AMEND)
Registration Support Branch
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

RE: Amendment for IMS Moth Balls, EPA Reg. No. 81433-2,
Submitted in Accordance with PR Notice 98-10

Dear Document Processing Officer:

On behalf of IMS Trading, L.L.C. (IMS), The Acta Group, L.L.C. (Acta) is submitting the accompanying amendment for the above-referenced product. This amendment is submitted for the addition of the brand name "Smart Living Moth Balls," as well as minor labeling changes. The additional brand name previously was submitted and rejected as false and misleading by the U.S. Environmental Protection Agency (EPA) in a December 17, 2009, letter from Jennifer Gaines. The rejection of the additional brand name was discussed with Acting Product Manager 7, Kable (Bo) Davis. Mr. Davis advised Acta that the basis for the rejection of the additional brand name was invalid and that the name should have been accepted. Further, Acta e-mailed Mr. Davis concerning other minor changes which have not been addressed by any correspondence from EPA. In response to the e-mail, Mr. Davis left a voice message for Mr. Jacoby on February 15, 2010, stating that because of the numerous changes, Acta should submit the application as an amendment to the registration record rather than a notification. Mr. Davis stated that because of the minor nature of the changes, the amendment would be reviewed as expeditiously as possible and should not take the full time typically allotted for non-PRIA fast track amendments. Accordingly, IMS is submitting this amendment to cover the proposed changes.

The Acta Group, L.L.C.
1203 Nineteenth Street, N.W.
Suite 300
Washington, D.C. 20036
TEL: 202/266-5020 • FAX: 202/557-3836
WEB: WWW.ACTAGROUP.COM

The Acta Group EU, Ltd
Avanta Royal Mills
47 Redhill Street
Ancoats Urban Village
Manchester M4 5BA
TEL: +44 (0) 161 216 4260 • FAX: +44 (0) 161 216 4261
WEB: WWW.ACTAGROUP.COM

Registered in England and Wales, No. 5307852
Registered office: The Acta Group EU, Ltd
1st Floor, Northern Assurance Buildings,
921 Princess Street, Manchester M2 4 DN



CHEMICAL PRODUCT DEVELOPMENT
AND DEFENSE

Document Processing Officer

February 24, 2010

Page 2

Also with this amendment, IMS is (1) adding Storage and Disposal statements in accordance with Pesticide Registration (PR) Notice 2007-4 and (2) adding the headings of "Distributed by:" or "Sold by:" as well as "Manufactured by:", which will be followed on the label by the name and address of the distributor and of the registrant respectively. The label has also been revised to meet the labeling changes specified in the Reregistration Eligibility Decision (RED). No other changes have been made to the registration record or the label.

In response to EPA's December 17, 2009, rejection letter, IMS has added the following subheadings to the Storage and Disposal language on its label: "Pesticide Storage", "Pesticide Disposal", and "Container Handling." The language concerning pesticide storage is the same as currently approved for IMS' registered product 81433-6; IMS believes the container handling language is consistent with the requirements in PR Notice 2007-4, and that the pesticide disposal language is appropriate.

Included with this submission are the following:

- EPA Form 8570-1;
- Five copies of the product label with proposed changes in redline; and
- One copy of the product label with the proposed changes accepted.

If you have any questions about this submission, please call either me at (202) 557-3815, Sheryl Lindros Dolan at (202) 557-3804, or Mr. Isaac M. Shapiro, President of IMS, at (323) 938-8868.

Sincerely,

A handwritten signature in dark ink, reading "Henry M. Jacoby". The signature is fluid and cursive, with the first name "Henry" and last name "Jacoby" clearly legible.

Henry M. Jacoby

Attachment

cc: Mr. Kable (Bo) Davis (via hand delivery) (w/attachments)



United States
Environmental Protection Agency
Washington, DC 20460

Registration

X
Amendment

Other

OPP Identifier
Number

Application for Pesticide - Section I

1. Company/Product Number 81433-2	2. EPA Product Manager Kable (Bo) Davis	3. Proposed Classification
4. Company/Product (Name) IMS Moth Balls	PM# 7 34	<input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
5. Name and Address of Applicant (Include Zip Code) IMS Trading, L.L.C. 6010 Wilshire Boulevard, Suite 503 Los Angeles, CA 90036 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Request an additional brand name and minor label changes.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) Cardboard box		
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled					

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Henry M. Jacoby, M.S.		Title Agent		Telephone No. (Include Area Code) (301) 865-9090	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title President			
4. Typed Name Isaac M. Shapiro		5. Date February 24, 2010			

Front Panel:

[Smart Living Moth Balls]
[IMS Moth Balls]
[Lavender Scented Moth Balls]
[Cedar Scented Moth Balls]
[Paper Covered Lavender Scented Moth Ball Packets]
[Paper Covered Cedar Scented Moth Ball Packets]

Kills Moths & Carpet Beetles

No Clinging Odor
Protects Clothing

When Used in Air-tight Containers This Product Can Treat Up to
[57 cu.ft (10 oz)]
[35 cu.ft (6 oz)]
[29 cu.ft (5 oz)]

KEEP OUT OF REACH OF CHILDREN.

WARNING: See Side and Back Panel For Addt'l Precautions

Ingredient Statement:

Active Ingredient: Paradichlorobenzene 99.5%
Other Ingredients: 0.5%
TOTAL: 100.0%

[Net Wt. 10 oz (283.5g)]
[Net Wt. 6 oz (171.2g)]
[Net Wt. 5 oz (142.6g)]

[IMS Moth Balls] [Smart Living Moth Balls] provide protection for articles stored in trunks, drawers, boxes, etc. They should be sprinkled or placed on the bottom of the storage space, between the folds and layers of clothes, and on top before securely closing the container.

Right Side Panel:

[protect in winter and summer and spring and fall.]

[[IMS Moth Balls] [Smart Living Moth Balls] ~~Packets~~ were specially developed to provide the excellent protection of moth balls without the strong smell and unwanted residue. [IMS Moth Balls] [Smart Living Moth Balls] ~~Packets~~ combine an effective mothproofing ingredient with a fresh [lavender] [cedar] scent to create pleasant smelling, reliable moth balls. These pleasant smelling moth balls are wrapped in breathable paper packets, which allow the active ingredient to work while protecting you and your clothes from messy flakes or residue.]

Directions for Use

It is a violation of federal law to use this product in a manner inconsistent with labeling.

IMPORTANT: Keep out of reach of children. Do not place in areas accessible to children.

Thoroughly brush or clean articles to be stored. Use at rate of [1 box (5 oz) for each 29 cubic feet] [1 box (6 oz) for each 35 cubic feet] [1 box (10 oz) for each 57 cubic feet] of tightly enclosed space.

[Sample Use Rates for Moth Ball Packets:

3 packets Small storage (3 cu.ft)

12 packets Average garment bag (12 cu.ft)

15 packets Large trunk (15 cu.ft)]

[To properly treat larger volumes, the use of additional containers of moth ball packets may be required. Use the recommended amount of moth ball packets to ensure protection of your clothes. Do not remove the moth balls from the packets.]

Distribute [IMS Moth Balls] [Smart Living Moth Balls] evenly around and between the folds of stored articles. Be sure storage space is kept tightly closed at all times and for at least 7 days after protecting with [IMS Moth Balls] [Smart Living Moth Balls]. Replace when moth balls have dissipated.

[IMS Moth Balls] [Smart Living Moth Balls] will not harm the finest woolens, furs, silk, or other fabrics. Pleasant odor quickly vanishes when articles are aired.

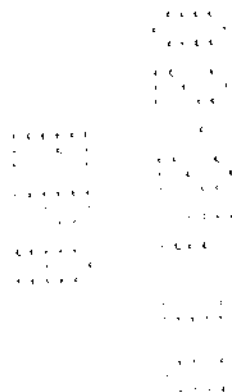
Paradichlorobenzene moth balls should not be mixed or placed in contact with Naphthalene moth balls or flakes.

Do not use plastic storage box or place in contact with plastic items as paradichlorobenzene damages some plastics.

Left Panel:

[Sold by:]/[Distributed by:]
[Name and address as appropriate]

Manufactured by:
IMS Trading, LLC
Los Angeles, CA
Made in China



Back Panel:

Precautionary Statements

Hazards to humans and domestic animals.

WARNING: Causes eye, skin, and respiratory tract irritation. Harmful if swallowed. Avoid contact with skin, eyes, or clothing.

Physical-Chemical Hazard. Combustible. Do not use or store near heat or open flame.

FIRST AID

If Swallowed - Call a poison control center or doctor immediately for treatment advice.

Have person sip a glass of water if able to swallow.

Do not induce vomiting unless told to do so by a poison control center or doctor.

Do not give anything by mouth to an unconscious person.

If on Skin or Clothing - Take off contaminated clothing.

Rinse skin immediately with plenty of water for 15-20 minutes.

Call a poison control center or doctor for treatment advice.

If Inhaled - Move person to fresh air.

If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.

Call a poison control center or doctor for further treatment advice.

If In Eyes - Hold eye open and rinse slowly and gently with water for 15-20 minutes.

Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

Call a poison control center or doctor for treatment advice.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the National Pesticide Information Center (NPIC) at 1-800-858-7378 for emergency medical treatment information.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

Storage and Disposal

Pesticide Storage: Store in original container in a dry place inaccessible to children and pets.

Pesticide Disposal: For unused product, call your local toxic waste agency for disposal instructions.

Container Handling: Non-refillable container. Do not refill or reuse empty box or cellophane. Offer for recycling, if available.

~~Non-refillable container. Do not refill or reuse empty box or cellophane. Wrap container and put in trash. Offer for recycling, if available.~~

Master Label for EPA Reg. No. 81433-2
Alternative Language Enclosed in Brackets []
Revision: February 24, 2010

Notice:

California has determined that a chemical contained in this product causes cancer based on tests performed on laboratory animals.

EPA Reg. No. 81433-2
EPA Est. 81217-CHN-001

| Batch Number: _____

Material to be added to an e-Jacket/Jacket

Reg. No. 81433-2

Dec # 424161

Description: _____ Please add the attached information to the jacket, thank you.

1. ☐ Placement within the e-Jacket/jacket:

☒ Default: (chronological, top = newest)

☐ File Location: (PDF page number, i.e., "before page 45")

This jacket is imaged, please scan.

2. ☐ Send to Data Extraction contractors this material:

☐ Newly stamped accepted label

☒ Notification

☐ New CSF

☐ Other: _____

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer's Name: Jennifer Gaines

Phone: 305-5967 Division: RD/IRB

Date: 1/27/2010



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

DEC 17 2009

Mr. Henry Jacoby
The Acta Group, L.L.C.
1203 19th St., N.W. Suite 300
Washington, D.C. 20036

Subject: Notification to Add Alternate Brand Name
IMS Moth Balls
EPA Registration No. 81433-2

Dear Mr. Jacoby:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated November 25, 2009 for the product IMS Moth Balls. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action(s) requested does not clearly fall within the scope of PRN 98-10 and will require additional administrative review of the related files. A summary of our findings include:

1. The name "Smart Living Moth Balls" is considered false and misleading because it gives the misconception that the consumer will become smarter from using the product.

Please be advised that PRNs are provided as guidance; they are not considered regulation by the Agency. Therefore, the RD reserves the right to make the above determination and concludes that this action must be submitted by you as an amendment. No further processing of this action will occur until a resubmission is made. The RD has determined that this action is denied and our records have been updated accordingly.

If you have any questions, please call me directly at 703-305-5967.

Sincerely,

A handwritten signature in cursive script that reads "Jennifer Gaines".

Jennifer Gaines
Wildlife Biologist
Insecticide-Rodenticide Branch
Registration Division (7505P)
Office of Pesticide Programs



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

DEC 17 2009

Mr. Henry Jacoby
The Acta Group, L.L.C.
1203 19th St., N.W. Suite 300
Washington, D.C. 20036

Subject: Notification of Change to Storage and Disposal per PR Notice 2007-4
IMS Moth Balls
EPA Registration No. 81433-2

Dear Mr. Jacoby:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4 dated November 25, 2009 for the product IMS Moth Balls. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 2007-4 and finds that the action(s) requested does not clearly fall within the scope of PRN 2007-4 and will require additional administrative review of the related files. A summary of our findings include:

1. The Storage and Disposal section is missing "Pesticide Storage", "Pesticide Disposal", and "Container Handling" subsections.

Please be advised that PRNs are provided as guidance; they are not considered regulation by the Agency. Therefore, the RD reserves the right to make the above determination and concludes that this action must be submitted by you as an amendment. No further processing of this action will occur until a resubmission is made. The RD has determined that this action is denied and our records have been updated accordingly.

If you have any questions, please call me directly at 703-305-5967.

Sincerely,

A handwritten signature in cursive script that reads "Jennifer Gaines".

Jennifer Gaines
Wildlife Biologist
Insecticide-Rodenticide Branch
Registration Division (7505P)
Office of Pesticide Programs

DENIED

DEC 17 2009

Front Panel:

[Smart Living Moth Balls]
[IMS Moth Balls]
[Lavender Scented Moth Balls]
[Cedar Scented Moth Balls]
[Paper Covered Lavender Scented Moth Ball Packets]
[Paper Covered Cedar Scented Moth Ball Packets]

Kills Moths & Carpet Beetles

No Clinging Odor
Protects Clothing

When Used in Air-tight Containers This Product Can Treat Up to
[57 cu.ft (10 oz)]
[35 cu.ft (6 oz)]
[29 cu.ft (5 oz)]

KEEP OUT OF REACH OF CHILDREN.

WARNING: See Side and Back Panel For Addt'l Precautions

Ingredient Statement:

Active Ingredient: Paradichlorobenzene	99.5%
Other Ingredients:	0.5%
TOTAL:	100.0%

[Net Wt. 10 oz (283.5g)]
[Net Wt. 6 oz (171.2g)]
[Net Wt. 5 oz (142.6g)]

[IMS Moth Balls] [Smart Living Moth Balls] provide protection for articles stored in trunks, drawers, boxes, etc. They should be sprinkled or placed on the bottom of the storage space, between the folds and layers of clothes, and on top before securely closing the container.

Right Side Panel:

[protect in winter and summer and spring and fall.]

[[IMS Moth Balls] [Smart Living Moth Balls] Packets-were specially developed to provide the excellent protection of moth balls without the strong smell and unwanted residue. [IMS Moth Balls] [Smart Living Moth Balls]Packets combine an effective mothproofing ingredient with a fresh [lavender] [cedar] scent to create pleasant smelling, reliable moth balls. These pleasant smelling moth balls are wrapped in breathable paper packets, which allow the active ingredient to work while protecting you and your clothes from messy flakes or residue.]

Directions for Use

It is a violation of federal law to use this product in a manner inconsistent with labeling.

Thoroughly brush or clean articles to be stored. Use at rate of [1 box (5 oz) for each 29 cubic feet] [1 box (6 oz) for each 35 cubic feet] [1 box (10 oz) for each 57 cubic feet] of tightly enclosed space.

[Sample Use Rates for Moth Ball Packets:

3 packets	Small storage (3 cu.ft)
12 packets	Average garment bag (12 cu.ft)
15 packets	Large trunk (15 cu.ft)]

[To properly treat larger volumes, the use of additional containers of moth ball packets may be required. Use the recommended amount of moth ball packets to ensure protection of your clothes. Do not remove the moth balls from the packets.]

[Distribute [IMS Moth Balls] [Smart Living Moth Balls] evenly around and between the folds of stored articles. Be sure storage space is kept tightly closed at all times and for at least 7 days after protecting with [IMS Moth Balls] [Smart Living Moth Balls]. Replace when moth balls have dissipated.

[IMS Moth Balls] [Smart Living Moth Balls] will not harm the finest woolens, furs, silk, or other fabrics. Pleasant odor quickly vanishes when articles are aired.

Paradichlorobenzene moth balls should not be mixed or placed in contact with Naphthalene moth balls or flakes.

Do not use plastic storage box or place in contact with plastic items as paradichlorobenzene damages some plastics.

Left Panel:

[Sold by:

[Name and address as appropriate]

[Distributed by:] [Manufactured by:]

IMS Trading, LLC

Los Angeles, CA

Made in China

Back Panel:

Precautionary Statements

Hazards to humans and domestic animals.

WARNING: Causes eye, skin, and respiratory tract irritation. Harmful if swallowed. Avoid contact with skin, eyes, or clothing.

Physical-Chemical Hazard. Combustible. Do not use or store near heat or open flame.

FIRST AID

If Swallowed - Call a poison control center or doctor immediately for treatment advice.

Have person sip a glass of water if able to swallow.

Do not induce vomiting unless told to do so by a poison control center or doctor.

Do not give anything by mouth to an unconscious person.

If on Skin or Clothing - Take off contaminated clothing.

Rinse skin immediately with plenty of water for 15-20 minutes.

Call a poison control center or doctor for treatment advice.

If Inhaled - Move person to fresh air.

If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.

Call a poison control center or doctor for further treatment advice.

If In Eyes - Hold eye open and rinse slowly and gently with water for 15-20 minutes.

Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

Call a poison control center or doctor for treatment advice.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the National Pesticide Information Center (NPIC) at 1-800-858-7378 for emergency medical treatment information.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

Storage and Disposal

Non-refillable container. Do not refill or reuse empty box or cellophane. Wrap container and put in trash. Offer for recycling, if available.

Notice:

California has determined that a chemical contained in this product causes cancer based on tests performed on laboratory animals.

EPA Reg. No. 81433-2

EPA Est. 81217-CHN-001



November 25th, 2009

Via Hand Delivery

Document Processing Desk (NOTIF)
Registration Support Branch
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

RE: Notification for IMS Moth Balls, EPA Reg. No. 81433-2,
Submitted in Accordance with PR Notice 98-10

Dear Document Processing Officer:

On behalf of IMS Trading, L.L.C. (IMS), The Acta Group, L.L.C. is submitting the accompanying notification application for the above-referenced product. This notification application is submitted in accordance with Pesticide Registration (PR) Notice 98-10, for the addition of the brand name "Smart Living Moth Balls" and changes in the label by adding "Sold by: [Name and address as appropriate]" and "Manufactured by:" as alternatives to "Distributed by:." Also, the container disposal statement has been updated in accordance with PR Notice 2007-4.

This notification is consistent with the provisions of PR Notice 98-10 and U.S. Environmental Protection Agency (EPA) regulations at 40 C.F.R. Section 152.46, and no other changes have been made to the labeling or the Confidential Statement of Formula for this product. The certification required by PR Notice 98-10 is included in the accompanying EPA Form 8570-1.

Included with this submission are the following:

- EPA Form 8570-1; and

The Acta Group, L.L.C.
1203 Nineteenth Street N.W. Suite 300, Washington, D.C. 20036
Tel: 202/266 5020 Fax: 202/557 3836

983.001 / 6 / 00052833.DOC

The Acta Group EU, Ltd.
The Heath Business and Technical Park,
Runcorn, Cheshire, WA7 4QX, UK
Tel: +44 (0) 1928 500056
Web: www.actagroup.com
Registered in England No. 5307852
Registered office: The Acta Group, U, Ltd. c/o PKF (UK)
LLP Sovereign House, Queen Street, Manchester M2 5HR



Document Processing Officer
November 25, 2009
Page 2

- Labels with proposed revisions, five copies in redline and one copy without redline.

If you have any questions about this submission, please call either me at (301) 865-9090, Sheryl Lindros Dolan at (202) 557-3804, or Mr. Isaac M. Shapiro, President of IMS, at (323) 938-8868.

Sincerely,

Henry M. Jacoby

Enclosures

<div style="display: inline-block; text-align: center; margin-left: 20px;"> United States Environmental Protection Agency Washington, DC 20460 </div>		Registration	OPP Identifier Number		
		Amendment			
		X Other			
Application for Pesticide - Section I					
1. Company/Product Number 81433-2	2. EPA Product Manager John Hebert	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted			
4. Company/Product (Name) IMS Moth Balls	PM# 7				
5. Name and Address of Applicant (Include Zip Code) IMS Trading, L.L.C. 6010 Wilshire Boulevard, Suite 503 Los Angeles, CA 90036 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____			
Section - II					
<div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification - Explain below. </div> <div style="width: 48%;"> <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other - Explain below. </div> </div>					
<p>Explanation: Use additional page(s) if necessary. (For Section I and Section II.) Revise label according to PR Notice 2007-4 and request an additional brand name. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 C.F.R. § 152.46, and no other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C. § 1001 to willfully make any false statements to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 C.F.R. § 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under Sections 12 and 14 of FIFRA.</p>					
Section - III					
1. Material This Product Will Be Packaged In:					
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Unit Packaging wgt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Package wgt No. per container	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) Cardboard box		
<div style="display: flex;"> <div style="width: 33%;">3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container</div> <div style="width: 33%;">4. Size(s) Retail Container</div> <div style="width: 33%;">5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product</div> </div>					
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled					
Section - IV					
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Henry M. Jacoby, M.S.	Title Agent	Telephone No. (Include Area Code) (301) 865-0090			
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received <div style="border: 1px solid black; width: 100px; height: 100px; margin: 10px auto; text-align: center; line-height: 100px;"> (Stamped) </div>		
				2. Signature 	3. Title President
				4. Typed Name Isaac M. Shapiro	5. Date November 25, 2009



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

13051

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

October 25, 2007

Mr. Henry M. Jacoby
Agent for IMS Trading, L.L.C.
The Acta Group, LLC
1203 Nineteenth Street, NW Suite 300
Washington, D.C. 20036

Subject: Label Notification

Dear Mr. Jacoby:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 9/26/07 for **EPA Registration 81433-2**. The Registration Division (RD) has conducted a review of this request for applicability under PRN 98-10 and finds that the label change(s) requested falls within the scope of PRN 98-10. The label has been date-stamped "Notification" and will be placed in our records.

If you have any questions, please contact me directly at 703-305-6249 or Sherada Hobgood of my staff at 703-308-8893.

Sincerely,

/s/

Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs

Macf 11/8/10

<div style="display: inline-block; text-align: center;"> United States Environmental Protection Agency Washington, DC 20460 </div>		<input type="checkbox"/> Registration <input checked="" type="checkbox"/> Amendment <input type="checkbox"/> Other	OPP Identifier Number
		Application for Pesticide - Section I	
		1. Company/Product Number 81433-2	
2. EPA Product Manager Venus Eagle		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted	
4. Company/Product (Name) IMS Moth Balls		PM# 1	
5. Name and Address of Applicant (Include Zip Code) IMS Trading, L.L.C. 6010 Wilshire Boulevard, Suite 503 Los Angeles, CA 90036 <input checked="" type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name <u>OCT 25 2007</u>	
Section - II			
<input checked="" type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Notification - Explain below. <input type="checkbox"/> Other - Explain below.			
Explanation: Use additional page(s) if necessary. (For Section I and Section II.) Minor formulation amendment pursuant to PR Notice 99-10, <u>revised label</u>			
Section - III			
1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Unit Packaging wgt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Package wgt. No. per container	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted			
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container	
		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			
Section - IV			
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Henry M. Jacoby, M.S.		Title Agent	
		Telephone No. (Include Area Code) (301) 865-9090	
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title President	
4. Typed Name Isaac M. Shapiro		5. Date September 26, 2007	

EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete.

White - EPA File Copy (original)

Yellow - Applicant Copy



September 28, 2007

Via Hand Delivery

Document Processing Desk (AMEND)
Minor Formulation Review Coordinator (MFRC)
Registration Support Branch
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

RE: Minor Formulation Amendments to IMS Moth Balls, EPA Reg. No. 81433-2 and IMS Moth Blocks, EPA Reg. No. 81433-3, Submitted in Accordance with PR Notice 98-10

Dear Document Processing Officer:

On behalf of IMS Trading, L.L.C. (IMS), The Acta Group, L.L.C. is submitting the accompanying amendment applications for the above-referenced products. These amendment applications are submitted in accordance with Pesticide Registration (PR) Notice 98-10, ~~for the addition of one or more fragrances in a formulation. IMS proposes to add, at a concentration of less than one percent, cedar and lavender scents to its currently registered formulations as alternate formulations. Material Safety Data Sheets (MSDS) for the fragrances accompany this submission. We have forwarded more detailed, confidential formulation information from the supplier directly to Mr. Kerry Leifer to include in U.S. Environmental Protection Agency (EPA) files.~~

~~The addition of the fragrances requires a slight adjustment to the nominal active ingredient concentration, so that the percentages will add to 100 percent. Accordingly, for registration numbers 81433-2 and 81433-3, we are submitting revised basic Confidential Statements of Formula (CSF), as well as alternate CSFs for each of the two fragrances, for a total of six CSFs.~~

Additionally, for IMS Moth Balls, Reg. No. 81433-2, the registrant proposes to sell the moth balls alternatively as individual balls, packaged in five-, six-, and ten-ounce boxes as currently done, or in paper packets, each containing two balls; the packets would be sold in

The Acta Group, L.L.C.
1203 Nineteenth Street, N.W., Suite 300, Washington, D.C. 20036
Tel: 202/266-5020 Fax: 202/557-3836

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The Acta Group EU, Ltd.
The Heath Business and Technical Park
Runcom, Cheshire, WA7 4QX, UK
Tel: +44 (0) 1928 500056
Web: www.actagroup.com
Registered in England No. 5307852
Registered office: The Acta Group EU, Ltd. c/o PKF (UK),
LLP Sovereign House, Queen Street, Manchester M2 5HR



Minor Formulation Review Coordinator
September 28, 2007
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same size boxes as the currently registered product. The paper packets are the same as those used in other currently registered products and are intended to facilitate use by consumers. The grouping of the moth balls into two-ball paper packets does not require a change to the application rate. Proposed changes to address the paper packets are included in the enclosed proposed revised labels.

As IMS wishes to continue to sell moth balls with and without the paper packets depending on market demand, and also to sell both the moth balls and moth blocks with and without the fragrances, proposed revisions to the labels for these products are being submitted in a master label format. Proposed alternative language is shown in brackets (e.g., [Lavender Scented Moth Balls], [Cedar Scented Moth Balls]) on the proposed revised labels in the accompanying submission. Proposed changes from the currently approved labels have been made in redline to facilitate EPA's review. A copy of the labels without the redline and including all of the proposed changes are also included in this submission.

Included with this submission are the following:

- EPA forms 8570-1;
- Labels with proposed revisions, five sets of each in redline and one set without redline;
- ~~CSFs for the basic and alternate formulations; and~~
- ~~MSDSs for the fragrances.~~

If you have any questions about this submission, please call either me at (301) 865-9090 or Sheryl Lindros Dolan at (202) 266-5031, or Mr. Isaac M. Shapiro, President of IMS, at (323) 939-8868.

Sincerely,

A handwritten signature in black ink, which appears to read "Henry M. Jacoby".

Henry M. Jacoby

Enclosures

OCT 25 2007

V. Draft Labels (5 copies)

Front Panel:

IMS Moth Balls
[Lavender Scented Moth Balls]
[Cedar Scented Moth Balls]
[Paper Covered Lavender Scented Moth Ball Packets]
[Paper Covered Cedar Scented Moth Ball Packets]

Kills Moths & Carpet Beetles

No Clinging Odor
Protects Clothing

When Used in Air-tight Containers This Product Can Treat Up to
[57 cu.ft (10 oz)]
[35 cu.ft (6 oz)]
[29 cu.ft (5 oz)]

KEEP OUT OF REACH OF CHILDREN.

WARNING: See Side and Back Panel For Addt'l Precautions

Ingredient Statement:

Active Ingredient: Paradichlorobenzene 99.85%
~~Other Inert~~ Ingredients: _____ 0.25%
TOTAL: _____ -100.0%

[Net Wt. 10 oz (283.5g)]
[Net Wt. 6 oz (171.2g)]
[Net Wt. 5 oz (141.72.65g)]

IMS Moth Balls provide protection for articles stored in trunks, drawers, boxes, etc. They should be sprinkled or placed on the bottom of the storage space, between the folds and layers of clothes, and on top before securely closing the container.

Right Side Panel:

[Protect in winter and summer and spring and fall.]

[IMS Moth Ball Packets were specially developed to provide the excellent protection of moth balls without the strong smell and unwanted residue. IMS Moth Ball Packets combine an effective mothproofing ingredient with a fresh [lavender] [cedar] scent to create pleasant smelling, reliable moth balls. These pleasant smelling moth balls are wrapped in breathable

paper packets, which allow the active ingredient to work while protecting you and your clothes from messy flakes or residue.]

Directions for Use

It is a violation of federal law to use this product in a manner inconsistent with labeling.

Thoroughly brush or clean articles to be stored. Use at rate of [1 box (5 oz) for each 29 cubic feet] [1 box (6 oz) for each 35 cubic feet] [1 box (10 oz) for each 57 cubic feet] of tightly enclosed space.

[Sample Use Rates for Moth Ball Packets:

<u>3 packets</u>	<u>Small storage (3 cu.ft)</u>
<u>12 packets</u>	<u>Average garment bag (12 cu.ft)</u>
<u>15 packets</u>	<u>Large trunk (15 cu.ft)]</u>

[To properly treat larger volumes, the use of additional containers of moth ball packets may be required. Use the recommended amount of moth ball packets to ensure protection of your clothes. Do not remove the moth balls from the packets.]

Distribute IMS Moth Balls evenly around and between the folds of stored articles. Be sure storage space is kept tightly closed at all times and for at least 7 days after protecting with IMS Moth Balls. Replace when moth balls have dissipated.

IMS Moth Balls will not harm the finest woolens, furs, silk, or other fabrics. Pleasant odor quickly vanishes when articles are aired.

Paradichlorobenzene moth balls should not be mixed or placed in contact with Naphthalene moth balls or flakes.

Do not use plastic storage box or place in contact with plastic items as paradichlorobenzene damages some plastics.

Left Panel:

Distributed by:
IMS Trading, LLC
Los Angeles, CA
Made in China

Back Panel:

Precautionary Statements

Hazards to humans and domestic animals.

WARNING: Causes eye, skin, and respiratory tract irritation. Harmful if swallowed. Avoid contact with skin, eyes, or clothing.

Physical-Chemical Hazard. Combustible. Do not use or store near heat or open flame.

FIRST AID

If Swallowed - Call a poison control center or doctor immediately for treatment advice.

Have person sip a glass of water if able to swallow.

Do not induce vomiting unless told to do so by a poison control center or doctor.

Do not give anything by mouth to an unconscious person.

If on Skin or Clothing - Take off contaminated clothing.

Rinse skin immediately with plenty of water for 15-20 minutes.

Call a poison control center or doctor for treatment advice.

If Inhaled - Move person to fresh air.

If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.

Call a poison control center or doctor for further treatment advice.

If In Eyes - Hold eye open and rinse slowly and gently with water for 15-20 minutes.

Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

Call a poison control center or doctor for treatment advice.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the National Pesticide Information Center (NPIC) at 1-800-858-7378 for emergency medical treatment information.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

Storage and Disposal

Do not reuse empty box or cellophane. Wrap container and put in trash.

Notice:

California has determined that a chemical contained in this product causes cancer based on tests performed on laboratory animals.

EPA Reg. No. 81433-2

EPA Est. 81217-CHN-001